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*Attorneys for Plaintiffs Sarah Simmons, Aaron McAllister,  
ROI-IT, LCC and all others similarly situated*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SARAH SIMMONS, an individual; AARON  
MCALLISTER, an individual; ROI-IT,  
LLC, a Nevada limited liability company on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

CACHET FINANCIAL SERVICES, a  
California corporation; FINANCIAL  
BUSINESS GROUP HOLDINGS, a  
California corporation; MYPAYROLLHR  
LLC, a Delaware limited liability company;  
CLOUD PAYROLL, LLC, a Delaware  
limited liability company; VALUEWISE  
CORP., a Delaware corporation; MICHAEL  
MANN, an individual; NATIONAL  
PAYMENT CORPORATION, a Florida  
corporation,

Defendants.

Case No. 2:19-cv-01624-GMN-VCF

**STIPULATION AND ORDER TO  
DISMISS WITH PREJUDICE**

Plaintiffs Sarah Simmons, Aaron McAllister and ROI-IT, LLC (together, "Plaintiffs")  
and Defendants Cachet Financial Services ("Cachet") and Financial Business Group Holdings  
("FBG") (together, "Defendants"), by and through their respective counsel of record, hereby

1 stipulate and agree to dismiss this case with prejudice, with each party to bear its own attorneys'  
2 fees and costs.

3 Entry of this Stipulation and Order will result in the dismissal of the entire action with  
4 prejudice as to all Defendants.

5 DATED this 6th day of October, 2023.

DATED this 6th day of October, 2023.

6 SEMENZA RICKARD LAW

MCNUTT LAW FIRM, P.C.

7 /s/ Lawrence J. Semenza, III

/s/ Daniel R. McNutt

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11 *Attorneys for Plaintiffs Sarah Simmons*  
12 *Aaron McAllister, ROI-IT, LLC and all*  
13 *others similarly situated*

*Attorneys for Defendants Cachet Financial*  
*Services and Financial Business Group,*  
*Holdings*

14 **ORDER**

15 **IT IS SO ORDERED.** The Clerk of Court is instructed to close the case.

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20 **UNITED STATES DISTRICT COURT JUDGE**

21 **DATED:** October 6, 2023  
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